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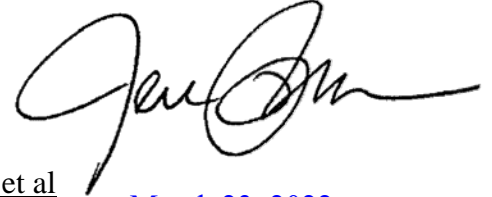
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March 23, 2022

VIA ECF

Hon. Jesse M. Furman
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Application GRANTED. The pretrial conference, currently scheduled for March 29, 2022, is adjourned to **May 24, 2022, at 4:00 p.m.** The Clerk of Court is directed to terminate ECF No. 121. SO ORDERED.



Re: Espinoza et al v. Euro Design and Stone LLC et al
Index No. 1:20-cv-04381-JMF

March 23, 2022

Your Honor:

This office represents Plaintiffs in the above captioned matter. This letter is written jointly to respectfully request an extension of time to complete discovery from March 18, 2022 to May 16, 2022 and subsequently, an adjournment of the pretrial conference from March 29, 2022 to May 20, 2022. This is the first such request.

Counsel has recently taken over this case from the predecessor in this case. Since taking over the case, Plaintiffs' Counsel has made multiple attempts to contact the *pro se* Defendants. Defendant Ozen has been out of the country since at least February 24, 2022. Defendant Ozen initially stated he would be back in the United States and available to discuss the matter before the discovery deadline, but recently notified Plaintiffs' Counsel that he will return to the United States at the end of March and needs additional time to discuss the matter and explore all possible resolutions of the matter. Defendant Ozen also stated that he believes Defendant Robert Lala moved to Albania. To date, Plaintiffs' Counsel has not been able to reach Defendant Robert Lala. The parties will move diligently to move the case forward.

We thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Ramsha Ansari
Ramsha Ansari, Esq.

cc: All counsel (VIA ECF)

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